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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

FILED RICHARD W. NAGEL CLERK OF COURT

JAN 24 2025 8: 02 /

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**DENNIS W. MCNAMARA** 

Defendant.

CASE NO

OF ONIO-

TUDGE STORY

**INFORMATION** 

18 U.S.C. § 1001(a)(2)

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE** (False Statements)

1. On or about July 12, 2023, in the Southern District of Ohio, the defendant, **DENNIS**W. MCNAMARA, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the United States government, specifically, **DENNIS** W. MCNAMARA stated to agents of the Federal Bureau of Investigation that he did not inform another individual, Jane Doe Two, about his representation of Jane Doe One in a pending federal investigation. The statement and representation was false because, as **DENNIS** W. MCNAMARA then and there knew, he informed Jane Doe Two that he was the attorney for Jane Doe One.

In violation of 18 U.S.C. § 1001(a)(2).

**COUNT TWO** 

(False Statements)

2. On or about July 12, 2023, in the Southern District of Ohio, the defendant, **DENNIS** 

W. MCNAMARA, did willfully and knowingly make a materially false, fictitious, and

fraudulent statement and representation in a matter within the jurisdiction of the executive

branch of the United States government, specifically, DENNIS W. MCNAMARA stated to

agents of the Federal Bureau of Investigation that he did not inform another individual, Jane Doe

Two, that his client, Jane Doe One, was cooperating with the United States. The statement and

representation was false because, as DENNIS W. MCNAMARA then and there knew, he

informed Jane Doe Two that Jane Doe One was providing information about a pending

investigation into a drug trafficking organization to the government.

In violation of 18 U.S.C. § 1001(a)(2).

ERIC G. OLSHAN

**UNITED STATES ATTORNEY** 

WESTERN DISTRICT OF

**PENNSYLVANIA** 

MARK V. GURZO (Maryland Bar)

**Special Assistant United States Attorneys** 

Acting Under Authority Conferred by 28 U.S.C. § 515